

Anna Nguyen

From: Anna Nguyen
Sent: Thursday, September 27, 2007 2:44 PM
To: 'Paul Henreid'
Subject: RE: Pellegrini: Opposition to Ex Parte Application for CMC Continuance

Paul,

I am writing to respond to your request for a stipulation to continue the case management conference until November 2, 2007. As you know, this case was filed on May 9, 2007. Our client, Mrs. Virginia Pellegrini as Trustee of the Virginia E. and Mario J. Pellegrini Trust, is an elderly woman and recent widower. She would like to resolve this matter before more time passes. Thus, Mrs. Pellegrini wishes to move this litigation forward and to avoid any further delays.

Furthermore, I understand that your request for a continuance stems from Brian Ledger's inability to attend the Case Management Conference ("CMC") at 1:30 pm. However, the October 5, 2007 CMC has been on calendar since June 4, 2007. Although the court changed the time of the CMC from 8:30 am to 1:30 pm on September 5, 2007, you have had at least 30 day notice of this time change. We believe that your firm has been provided adequate notice to allow for attendance at the October 5 CMC.

Moreover, Defendants are represented by Gordon and Rees, a large firm consisting of more than 320 attorneys in fourteen offices. Your firm has the resources to substitute you or any other attorney for Mr. Ledger. We see no reason to delay the CMC for another month. Therefore, we intend to oppose your ex-parte application to continue the CMC.

Anna

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10/1/2007